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RRRES CONTROL
JTGOING LTR NO

93 RF 6732

EG&G ROCKY FLATS

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June 1 1993

93 RF 6732

J K Hartman
Assistant Manager for Transition
and Environmental Restoration
DOE RFO

Attn S R Grace

OPERABLE UNIT NO 2 (OU 2) SCHEDULE IMPACTS RLB 260 93

The Operable Unit (OU) 1 negotiations have impacted the OU 2 schedule Groundwater contaminants of concern (COCs) were planned to be presented to the regulatory agencies on March 19 1993 However the OU 1 negotiations necessitated changes in the methodology for determining these COCs which delayed presentation of this data

The method OU 2 is using for determining the COCs was presented to the regulatory agencies on May 26 1993 The agencies agreed with the methodology that was used Groundwater COC determination was already proceeding at the time of agency approval in order to maintain the schedule

Because of the delay in COC determination other related tasks have been delayed including contaminant transport modeling and toxicity assessment. The schedule delay is estimated at approximately three months This was calculated by taking the planned date for groundwater COC determination of March 19 1993 from the anticipated completion date of June 14 1993

We are still working towards meeting the extension request schedule date of December 16 1993 for submittal of the OU 2 Draft Phase II RCRA Facilities Investigation/ Remedial Investigation (RFI/RI) Report to the agencies In order to meet this date the following applies

A qualitative uncertainty analysis will be done instead of a quantitative uncertainty analysis for the human health risk assessment The quantitative uncertainty analysis would probably result in a lower Reasonable Maximum Exposure (RME) In the case of OU 1 the agencies stated that they preferred the use of a point estimate of the RME exposure instead of a quantitative uncertainty analysis However a quantitative uncertainty analysis allows DOE the ability to negotiate an appropriate RME If schedule and budget permits a rigorous qualitative analysis will be done If more time is available the quantitative uncertainty analysis will be done instead These uncertainty analyses are not specified by any work plan or regulatory guidance

Bounding factors will be used for the exposure factors that are chemical specific. This was the accepted method used by OU 1 but probably yields a higher risk than is obtained by doing chemical specific calculations Operable Unit No 2 had originally planned on doing the more scientifically based in depth calculations

All tasks are being expedited Any partial work that can be done early is being done rather than waiting for completion of the predecessor task

ADMIN RECORD

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REVIEWED FOR CLASSIFICATION/UCNI

BY G T Ostried

DATE 8-9-93

DIST	
NEDETTI RL	X
NIAMIN A	
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TEWART DL	
JLLIVAN MT	
WANSON ER	
ILKINSON RB	X
LIAMIS S (ORCI)	
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ANE JO	
Kimrose AL	X
Busby WS	X
Heil EA	X
Roberts RS	X
Smith DA	X
RM Truck	X
OU 2 File	X
for RFP	X
RRRES CONTROL	
RAFFIC	
Edwin Ree	X

CLASSIFICATION

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SECRET	

AUTHORIZED CLASSIFIER
SIGNATURE
DOCUMENT CLASSIFICATION
VIEW WAIVER PER
CLASSIFICATION OFFICE
DATE

IN REPLY TO RFP CC NO

ACTION ITEM STATUS

☐ OPEN ☐ CLOSED

☐ PARTIAL

LTR APPROVALS

Walt ALP
ORIG & TYPIST INITIALS

J K Hartman
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As discussed at the OU 2 extension request meetings work is being done prior to agency approval of Technical Memoranda (Tech Memos) This includes bedrock drilling in advance of formal approval of the TM 8 Bedrock Work Plan groundwater modeling completed before the formal approval of tech memo TM 6 Modeling groundwater COC determination before writing the COC Tech Memo and groundwater toxicity assessments are planned to begin concurrent with writing the Toxicity Assessment TM The project risk of agency rejection is being minimized by


Timely meetings and interim product draft submittals to the agencies to present information and get approval on methods or data that will be included in Tech Memos and

When possible methods are used that were used by OU 1 and were previously approved by the agencies

One OU wide risk assessment and a limited number of anomaly assessments are in progress in order to meet the December 16 1993 schedule A detailed analysis of the impact on the OU 2 schedule from the risk assessments agreed to during the OU 1 negotiations is being conducted and will be sent to DOE on June 4 1993 This will include the assumptions consequences and benefits of several risk options and will include an EG&G recommendation for which option to follow

As discussed in the OU 2 extension request meetings only the information available from the bedrock program will be presented in the Draft Phase II RFI/RI report EG&G assumes that the agencies have neither formally approved nor disapproved of this approach but are aware of this

If you have any questions or comments concerning this letter please contact A L Primrose of Remediation Project Management at extension 8618



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Ong and 1 cc J K Hartman